UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER DISASTER SITE LITIGATION

21 MC 102 (AKH)

TADEUSZ KOWALEWSKI AND BEATA KOWALWESKI,

DOCKET NO. 06-CV-01521-AKH

Plaintiff(s),

NOTICE OF DEPOSITION UPON ORAL EXAMINATION

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DEUTSCHE BANK TRUST COMPANY AMERICAS, et al.,

Defendants.

PLEASE TAKE NOTICE, that pursuant to Fed. R. Civ. P. 30, the Defendants' Liaison Counsel and Defendants will conduct a deposition upon oral examination of Dr. Stasia Wieber, M.D., for plaintiff Tadeusz Kowalewski ("Plaintiff") in the above-captioned lawsuit, before a notary public or other officer authorized by law to administer oaths, at 10:00 a.m. on the 24th day of January, 2014, at Day Pitney LLP, One Canterbury Green, 201 Broad Street, Stamford, Connecticut 06901, and on any adjourned date thereof, and from day to day thereafter until completed. You are invited to attend and cross-examine; and

**PLEASE TAKE FURTHER NOTICE**, that pursuant to Fed. R. Civ. P. 34, Defendants have requested that Dr. Wieber produce for inspection and copying all documents and things in response to the requests set forth in the subpoena and accompanying Exhibit "A" attached hereto at a time and place mutually agreeable to counsel prior to the depositions; and

PLEASE TAKE FURTHER NOTICE that the deposition may be videotaped.

Dated: New York, New York January 22, 2014

## DAY PITNEY LLP

By:

Benjamin E. Haglund
A Member of the Firm

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On behalf of the Defense Liaison Committee for Defendants in the 21 MC 102 and 21 MC 103 Dockets and as Attorneys for Defendant Deutsche Bank Trust Company Americas Deutsche Bank Trust Corporation DB Private Clients Corporation DBAB Wall Street LLC

TO: Gregory J. Cannata and Robert A. Grochow Gregory J. Cannata and Associates 233 Broadway, 5<sup>th</sup> Floor New York, New York 10279

## **CERTIFICATE OF SERVICE**

I hereby certify that on January 22, 2014, I caused the within Notice of Deposition Upon Oral Examination to be served to all counsel by e-mail and additionally by United States Mail upon the following counsel:

Gregory J. Cannata and Robert A. Grochow Gregory J. Cannata and Associates 233 Broadway, 5<sup>th</sup> Floor New York, New York 10279

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